Office of Chief Counsel Internal Revenue Service **Memorandum**

Number: 200651032 Release Date: 12/22/06 CC:TEGE:EOEG:ET1 POSTN-139597-06 UILC: 3231.01-00 date: September 19, 2006 to: Director, Submission Processing Cincinnati, OH Attn: Entity Unit from: Office of Division Counsel/Associate Chief Counsel (Tax Exempt & Government Entities) subject: Railroad Retirement Tax Act Status In accordance with the coordination procedure established between the Service and the Railroad Retirement Board (RRB), the RRB has provided us with its opinion dated , that the following business ceased to be an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act effective We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that ceased to be an employer under the Railroad Retirement Tax Act in , with compensation last paid . Please take the appropriate action regarding this business. on

Janine Cook